

PATENT

Atty. Dkt. No. SEA/2843

REMARKS

This amendment is submitted in response to the Office Action dated December 9, 2003; reconsideration allowance of claims is requested.

In this Office Action, Examiner rejected claims 1-8 is being indefinite. Therefore, the requested changes to claims 1 and 5 have been made.

As a result, the limitation stating that the coating the is scraped from the surfaces of the lamination features to thereby ground the stator laminations to the shaft or base of a motor is now affirmatively and positively recited, and clearly distinguishes these claims and newly prosecuted claim 9 from the references.

Claims 1-8 are currently rejected as unpatenable over *Kitahara* (US Patent No. 4,670,298) in view of *Getschmann* (US Patent No. 6,265,802) and *Aiello* (US Patent No 5,965,966). This is respectfully traversed. The Examiner concedes that *Kitahara* does not teach stator laminations with features defined so that coating is scraped from the features by interference fit to ground the stator to shaft or base of the motor.

The Examiner argues that these features are taught by *Getschmann* and *Aiello*, and further argues that the test is what the combined teachings of the references would suggest to those of skilled in the Art. However, contrary to the Examiner's conclusion, there was no suggestion in either reference that the features on the laminations are defined so the coating is scraped from those features to ground the laminations to the shaft or base of the motor bearing.

Contrary to Examiner's argument, *Getschmann* simply teaches fitting laminations over a shaft or the like by an interference fit. He does not teach or suggest anything about grounding those laminations to the shaft; and in fact since the shaft and laminations are rotating, such grounding would be extremely difficult and very unlikely. His specification says nothing about this issue. In contrast, in the present invention the laminations are grounded to either a shaft or to a base of the motor. In fact, Claim 4 is quite specific grounding the lamination to the base of a motor assembly, a claimed featured which is not taught or suggested by *Getschmann* or the remainder the art.

The Examiner attempts to supply this deficiency by relying on *Aiello*. However, while it is agreed that *Aiello* teaches using a separate clip to scrape the coating from the

Page 5

242982_1

PATENT


Atty. Dkt. No. SEA/2043

laminations in order to ground the laminations to the shaft or the motor, this does not teach any way to modify *Getschmann* to meet the claims. When reading the combined teachings of *Getschmann* and *Aiello*, as the Examiner insists we must do, combining the teachings of the references would only suggest to one that is skilled in the art to use the *Aiello* clip in combination with the laminations of *Getschmann* to ground those laminations.

Finally, the Examiner does not even suggest how this combination of references could meet the limitations of Claim 4 where the lamination features are fitted to the base and are grounded to that base.

In view of these clear distinctions, reconsideration in the allowance of the claims is respectfully requested.

Respectfully submitted,



James A. Sheridan

Registration No. 25,435

MOSER, PATTERSON & SHERIDAN, L.L.P.

595 Shrewsbury Ave., Suite 100

Shrewsbury, NJ 07702

Telephone: (650) 330-2310

Facsimile: (650) 330-2314

Attorney for Applicant(s)